


**LAW OFFICES OF
MARK LEWIS SCHULMAN**

June 12,

Honorable Philip M. Halpern, District Judge
The Hon. Charles L. Brieant, Jr. Federal Building
300 Quarropas St.
White Plains, NY 10601-4150

Application granted. The time for Plaintiff to file its response to Defendant's letter requesting a pre-motion conference regarding its anticipated motion to strike Plaintiff's Rule 56.1 Statement is extended to June 16, 2023.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 12, 2023

Re: Melinda L. Johnson v The Hartford
USDC SDNY
Case No.: **7:22-cv-06394-PMH**
Letter Motion for Extension of Time to File All Plaintiff's Motion
Papers Electronically

Dear Honorable Judge Halpern:

I represent plaintiff, Melinda L. Johnson, in this ERISA benefits dispute. I write pursuant to Section 1.C of your Honor's Individual Practices in Civil Cases, to request an Extension of Time until June 16th to File all Plaintiff's Motion Papers Electronically. This is plaintiff's first request for an extension of this deadline.

Good cause exists to grant this request. The week of June 5, I was confined to bed, due to physical complications I was experiencing secondary to my regiment of hormone treatment for my prostate cancer as well as the disease itself. My ability to ambulate was severely limited as was my ability to perform normal hygiene and daily physical routines.

Due to my severe physical limitations the week of June 5th, I was unable to be driven to my office where I performed "electronic filing" or to even follow up with the Court's Memo Endorsement of 5/11/2023 regarding final filing deadline of June 8, 2023. In fact, that Memo addressed this attorney's filing debacle concerning the then "two-week adjournment". No matter what I did, at that time, I was unable to file correctly and had to rely upon telephonic communication.

To compete the "electronic filing of motion papers" as well as travel to and from the office, I am relying upon my son-in-law who is employed by Sullivan County as a computer programmer.

I apologize for the necessity of this request and my current physical and mental shortcomings further reducing the ability of an otherwise normal 74-year-old. If my condition does not improve, I will advise my client to obtain substitute counsel. I was initially unable to locate another lawyer to take this case and commenced this action due to my prior representation of the client in New York Workers' Compensation.

I emailed opposing counsel and obtained his consent to this adjournment.

I apologize for this inconvenience.

Thank you for your valuable time and kind consideration.

Sincerely yours,

Mark Lewis Schulman

MARK LEWIS SCHULMAN

cc. Melinda L. Johnson
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